

Higher Education Student Protection Plan

Introduction

Morley College London has created opportunities for higher learning throughout its history. Progressive practice within the College's specialised areas of the study in arts, culture and applied sciences is a notable feature of Morley's adult education provision. In September 2017 the College introduced prescribed Higher Education (HE) for the first time in its history, establishing a suite of Higher National Diploma awards operating under license from Pearson in areas of study including Popular Music; Performing Arts; Product Design (Ceramics and Fashion); Health and Social Care and Business. Higher Education developments seek to build on this extensive experience of mostly unaccredited higher learning.

The Student Protection Plan states how the College will endeavour to preserve the continuation and quality of study of its HE students should a risk to such continuation crystallise. The plan is supported by the following College documents which form an integral part of our approach to student protection and are referred to within this plan:

- *2016-2020 Curriculum Strategy*
- *Business Continuity Plan*
- *Higher Education and Advanced Learning Course Closure Policy*
- *Fees and Refunds policy*

Risk Assessment

We recognise that for prescribed HE, Morley is a new entrant to the HE sector as a provider in its own right. To minimise risks related to a new entrant into the market, this new provision plays to the College's well-established curricular strengths and areas of subject expertise. Our vision is to create and sustain coherent and attractive pathways of higher study that are distinctive to Morley's ethos and subject expertise in arts, culture and applied sciences.

As stated in our **2016-2020 Curriculum Strategy** our objective is to be proactive in risk management, identifying, analysing and responding to risk factors associated with the development of new HE provision. We aim to ensure the on-going sustainability of HE provision through a systematic and evidenced-based approach that is led by student demand and which is rigorous in ensuring a high quality student experience that represents good value for money.

Many of our HNDs require highly specialised, technical expertise, however the risk that we are no longer able to deliver individual modules within our programmes due to staff unavailability is low because we have a large cohort of sessional lecturers in each curriculum area and are able to provide cover for all our subjects. In addition, our modules are designed to be taught by integrated teams of academic staff led by a Programme Leader for each Diploma who is also a subject specialist.

The risk that the College will not be able to continue to provide continuity of education is low. The College has a current ESFA Financial Health rating of 'Outstanding' and expects to remain 'Good' or

higher in its most recent two-year financial plan submitted to the ESFA with the expected change in rating due to investment in the College's estate. The College has robust systems and controls in place to monitor financial sustainability, such as rigorous monthly financial monitoring, effective financial forecasting, strong financial controls, internal audit scrutiny and well-developed risk management processes.

Environmental risks such as those associated with catastrophic events or Force Majeure are addressed in the College ***Business Continuity Plan*** and referred to in the next section.

Mitigation Measures

Should the College be unable to deliver a programme we will follow the procedures set out within the College's ***Higher Education Programme Closure and Cancellation Policy***. The Programme Closure Policy has been informed by the Quality Assurance Agency's Quality Code for Higher Education (Chapter B8) and the regulatory objectives of the Office for Students, notably relating to the ongoing condition of registration C3 (Student Protection Plan). The Policy is available on the College website alongside other student facing policies.

It is the duty of the College to ensure that, where a decision to close a course has been made, it takes all reasonable measures to notify and protect the interests of affected students. The College has a series of protocols relating to course closure as defined within the Policy. The decision to close a course is taken in accordance with these protocols. The protocols:

- are student-focused, transparent and time sensitive
- aim to minimise the inconvenience and cost to students of course cancellations, including but not limited to the payment of fees, travel arrangements and additional support costs.
- seek to enable and support students to source and attend suitable alternative course, either at the College or with another educational provider in London.

In the event of a programme or provider closure elsewhere the College would accept students to our Higher National provision, when possible, to finish their courses. If the course was not a direct match by qualification we would RPL the student, wherever possible, to support their continuity in learning.

Our current ***Risk Register*** identifies the 'inability to recruit and/or retain staff of the required experience/expertise, including temporary cover; loss of key staff through stress or long term sickness' as a medium level risk which is mitigated by a number of 'Controls & Monitoring Procedures' which include:

- Recruitment & Selection procedure
- Probation Policy
- Performance Management policy
- Pay scales linked to national scales
- HR Committee
- Stress Management policy

- Absence management procedure
- Return to work interviews

All our HE provision is delivered from our main College site, which provides a range of dedicated specialist resources for our HE courses. The College ***Business Continuity Plan*** describes the manner in which the College will respond to disasters affecting our premises and therefore our ability to deliver our courses. The Plan provides a framework for taking the College through the process of establishing temporary arrangements to ensure that normal College activities are resumed as soon as possible, which actions will take place, including finding safe, secure teaching environments and how to minimise the inconvenience to students and staff.

Refunds and Compensations

Our ***Fees and Refunds policy*** explains the conditions under which the College will refund to students fees and charges they may have already paid.

With specific reference to Advanced and Higher Learning the policy states:

- In the event that the College fails to deliver the agreed provision or where there is evidence that the College has not followed an Awarding Organisation's policies and procedures, including appropriate registration, any self-funded fees will be repaid and student loans will not be activated.
- Cancelled session: If a session cannot go ahead then the College will make up the lost session over the course of the year; no refund or partial refund will therefore be payable.
- If a loan-funded student withdraws from the course either before the start of the course or during the course, the College's attendance records will ensure that loan funding ceases - the College will notify the Student Loan Company of a Change of Circumstance and the student's loan balance would be adjusted accordingly. The College will not actively seek to recover the remaining course fees from the student.
- For all year-long courses, if a self-funded student who is paying their fees in staged payments withdraws from the course, the student will be liable for the accrued fee at the point of withdrawal. The College will not actively seek to recover the remaining course fees from the student.
- For self-funded student requesting a refund before the start of the course a written notice of withdrawal must be received by the College at least 10 working days before the start of the course. The student will receive a refund of fees paid, less a cancellation fee to cover the administration costs (£50 for fees of £500+).

Our financial strategy is to ensure that we keep at least £1m cash reserves at any one time; this will be sufficient to provide refunds and compensations even in the worst and very unlikely scenario where we are forced to discontinue our entire HE provision. In addition, by August 2019 we will put in place insurance arrangements to provide additional compensation for students a risk of non-continuation of study should unforeseen circumstances arise.

Communication with Students

The College publishes the Student Protection Plan on its website within the student policy section at <https://www.morleycollege.ac.uk/policies> and on the College's virtual learning environment, Moodle at <https://vle.morleycollege.ac.uk/>. Prospective and new Higher Education students are also informed about the plan during the application process and their induction period at the start of their programme.

Any changes to the Student Protection Plan as well as to the Higher Education Programme Closure and Cancellation Policy will be consulted on with students at the Student Journey Sub-Committee and Student Council meetings. As part of wider consultation, the Plan will be shared with the wider College community for comment when appropriate to do so. Any amendments will also be considered in the future by the Higher Education Sub-Committee, which also has student representation. During these consultations, checks also take place to ensure the document is written in plain English and that they meet the Equality Screening standards.

Should we need to implement our student protection plan we will do everything possible to minimise the inconvenience and expense of course closure to students. As stated in our Higher Education and Advanced Learning Course Closure Policy the following actions will be initiated:

- Students will be warned that a course is at risk of closure as soon as is practicably possible.
- In circumstances where potential closure is linked to a failure to achieve the critical number of students, the College will endeavour to recruit sufficient numbers as far as is practicably possible.
- Where it is clear the best efforts of the College are unlikely to recruit the critical number of students, all students enrolled or yet to enrol on the course will be notified of closure not less than four weeks before scheduled commencement (subject to circumstances beyond the College's control).
- The College shall provide help and advice to those enrolled on the closed course to find an alternative course within the College, whether they are newly enrolled or existing students.
- Should an alternative course not be available in the College, help and advice will be provided to find a suitable alternative course with a local educational provider in London.
- Where a student decides to withdraw from the course and not transfer to an alternative within the College, the College will initiate communication with the Student Loans Company and/or the Education and Skills Funding Agency for any refund of fees that may be payable.